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Docket Management Facility  
U.S. Department of Transportation  
400 Seventh Street, SW  
Nassif Building  
Room PL-401  
Washington, DC 20590-001

Docket Number FAA-2004-17041

Subject: Docket No. FAA-2004-17041, Comments on Noise Stringency Increase for Single-Engine Propeller-Driven Small Airplanes

I respectfully request that my comments be included in consideration of any final rule. Currently, I am a graduate student in the School of Aerospace Sciences at the University of North Dakota. I am also the holder of a Commercial Pilot Certificate and a Flight Instructor's Certificate. In addition to my flight qualifications and experience, I also reside along the departure and arrival paths of one of the runways at the Southern Wisconsin Regional Airport (KJVL) located in Janesville, WI.

I concur with the proposed rule change relating to the issuance of new type certificates. As new aircraft are created, they should be designed using the latest technologies including those associated with creating aircraft that are "good neighbors". This "good neighbor" aspect is especially critical as land adjacent to airports continues to be more heavily developed.

Regrettably, I disagree with the proposal that new applications for Supplemental Type Certificates (STC) be required to meet the revised noise standards. This "after the fact" requirement has the potential to seriously hamper creation and production of aircraft modifications designed to increase safety, performance, or efficiency of older aircraft. Those STC that are created under this proposed rule will likely have a higher cost. This increased cost would in turn be passed to aircraft owners thus reducing the STC benefit. With a simple change to the proposed regulation, I could support it. This would be a change to the proposed regulation to allow approval of new STC applications if the application meets any of one of the following provisions.

1. The modification does not affect the propeller or the aircraft power plant. A sound test of the modified aircraft must show that installation of the modifications has a sound level equal to or less than the unmodified aircraft. Accessories normally associated with the power plant such as alternators, magnetos, and starters would be categorized in this provision.

2. The modification makes changes to the propeller or power plant, excluding accessories. The modified aircraft is able to pass a sound test that confirms the modification along with other current available STC's meets the noise requirements of the proposed regulation. Sub-components of the power plant such as cylinders would be covered in this provision.

3. The modification makes a change to the propeller or power plant. The modified aircraft is unable to pass a sound test because of lack of currently available modifications for its type that would bring it into compliance with the new regulation.

With the change that I have proposed, I concur with the new regulation. I believe it is important for new aircraft to be as "non-pilot" friendly as feasible. However, I do not believe that increased aircraft noise standards should be the only means to engender a "good neighbor" policy. The FAA should also examine other than aircraft certification means. For example, creating and updating airport noise abatement procedures, revisiting minimum altitude rules, and pilot education may also prove to be beneficial.

I believe that United States aviation regulations, lacking sound cause to do otherwise, should align with International Civil Aviation Organization (ICAO) rules. A conscientious effort to maintain this ICAO alignment would assist in ensuring that U.S. aircraft are not denied rights in other countries because the aircraft noise level is rated as excessive by the U.S..

Sincerely,

Casey A Daniels